

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN

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EDGEWOOD HIGH SCHOOL OF THE  
SACRED HEART, INC.,

Plaintiff,

Case No. 3:21-cv-00118

v.

CITY OF MADISON, WISCONSIN, *et al.*,

Defendants.

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**MOTION FOR LEAVE TO FILE DECLARATION *IN CAMERA***

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The City of Madison, City of Madison Zoning Board of Appeals, City of Madison Plan Commission, and City of Madison Common Council, (collectively “the City” or “defendants”), by their attorneys at Boardman & Clark LLP, moves the court for leave to file the declaration of Michael P. May *in camera* outside of the ECF filing system, with an unredacted version of CITY-DEF-052797 as an exhibit. The grounds for this motion are that plaintiff has filed a motion to compel (dkt. #63) challenging the redaction for attorney-client privilege of CITY-DEF-052797 and the documents are relevant to the Court’s consideration of that argument. However, filing these documents in ECF would operate to waive the privilege as such would reveal the confidential communication to plaintiff. Accordingly, defendants move for leave to file these documents *in camera*.

Dated September 1, 2022.

BOARDMAN & CLARK LLP

/s/ Sarah A. Zylstra

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